

Exhibit 16

**Rebuttal Expert Report
and
Correction to Supplemental
Expert Report
of
Thomas A. Myers**

*Mark Hale, Todd Shadle, Laurie Loger and Mark Covington, on behalf
of themselves and all others similarly situated, Plaintiffs,*

v.

*State Farm Mutual Automobile Insurance Company, Ed Murnane and
William G. Shepherd, Defendants*

United States District Court of the Southern District of Illinois

No. 3:12-cv-00660-DRH-SCW

After reviewing the reports and depositions of State Farm's rebuttal experts, and after further review of the telephone records summaries, I am submitting this Rebuttal Expert Report and Correction to my Supplemental Expert Report in *Mark Hale, Todd Shadle, Laurie Loger and Mark Covington, on behalf of themselves and all others similarly situated, Plaintiffs, v. State Farm Mutual Automobile Insurance Company, Ed Murnane and William G. Shepherd, Defendants*, United States District Court of the Southern District of Illinois, No. 3:12-cv-00660-DRH-SCW to reflect and incorporate (1) corrections to the telephone summaries and spreadsheets (which were corrected by eliminating duplicate phone calls contained in the summaries); (2) corrections to the calculation of damages to account for leap years; (3) to include the underlying phone data produced by State Farm, AT&T and Verizon that was omitted from the Appendix of my Supplemental Report; (4) to include a chart showing the corrected number of calls associated with the summaries; (5) to include a categorized phone number list identifying the phone numbers in each consolidated group; and (6) to include a document (Mur. 0484) that was omitted from the Appendix of my Supplemental Report.

The summaries of phone calls serve to rebut the opinions and testimony of Bruce G. Dubinsky in paragraphs 28 and 29 of his report dated October 30, 2017. The timing and number of calls directly rebut opinions or arguments by Dubinsky that there is no evidence of influence or control by State Farm over the use of funds contributed by State Farm.

Further, the phone calls are part of the evidence substantiating State Farm's intended use of funds contributed by State Farm.

The updated and corrected spreadsheets accurately summarize the phone calls contained within the telephone logs produced by State Farm, AT&T and Verizon.

The damage calculations in my Supplemental Expert Report dated September 24, 2017 require a slight modification. In footnote 105 of Dr. Stiroh's report and the accompanying Exhibit 4, Dr. Stiroh noted an adjustment that should be made to my calculation to account for leap years in which there were 366 days. Upon review of the footnote and exhibit, I agree that a modification is appropriate as she suggests. The corrected amount before trebling is approximately \$2,821.8 Million, which results in an after trebling number of approximately \$8,465.4 Million.

None of the opinions expressed in my Original Report or Supplemental Report have changed.



December 4, 2017

Thomas A. Myers

CORRECTION TO APPENDIX

Appendix C: Additional Documents Relied Upon

List of Documents Provided by Counsel, or obtained by T.A. Myers & Co., for review in Hale, et al. v. State Farm Mutual Automotive Insurance Company, et al., Case No. 3:12-cv-00660-DRH-SCW in the United States District Court, Southern District of Illinois.

Additional documents produced and relied on for my report:

Mur. 0484 (previously relied on, but not identified in Supplemental Report)

Corrected Phone Records:

INDEX OF PHONE CALLS SPREADSHEETS

Spreadsheet – ICJL & William Shepherd – January 1, 2003-December 31, 2005 (300 Calls)
Spreadsheet – ICJL & William Shepherd – January 1, 2003-November 3, 2004 (169 Calls)
Spreadsheet – ICJL & William Shepherd – November 4, 2004-August 19, 2005 (81 Calls)
Spreadsheet – ICJL & William Shepherd – August 20, 2005-December 31, 2005 (50 Calls)
Spreadsheet – ICJL & State Farm – January 1, 2003-December 31, 2005 (403 Calls)
Spreadsheet – ICJL & State Farm – January 1, 2003-November 3, 2004 (244 Calls)
Spreadsheet – ICJL & State Farm – November 4, 2004-August 19, 2005 (97 Calls)
Spreadsheet – ICJL & State Farm – August 20, 2005-December 31, 2005 (62 Calls)
Spreadsheet – State Farm & ATRA – January 1, 2003-December 31, 2005 (55 Calls)
Spreadsheet – State Farm & ATRA – January 1, 2003-November 3, 2004 (32 Calls)
Spreadsheet – State Farm & ATRA – November 4, 2004-August 19, 2005 (12 Calls)
Spreadsheet – State Farm & ATRA – August 20, 2005-December 31, 2005 (11 Calls)
Spreadsheet – State Farm & JOBS Coalition – January 1, 2003-December 31, 2005 (30 Calls)
Spreadsheet – State Farm & JOBS Coalition – January 1, 2003-November 3, 2004 (26 Calls)
Spreadsheet – State Farm & JOBS Coalition – November 4, 2004-August 19, 2005 (1 Call)
Spreadsheet – State Farm & JOBS Coalition – August 20, 2005-December 31, 2005 (3 Calls)
Spreadsheet – JOBS Coalition & Karmer Campaign – January 1, 2003-December 31, 2005 (1 Calls)
Spreadsheet – JOBS Coalition & Karmer Campaign – January 1, 2003-November 3, 2004 (1 Call)
Spreadsheet – JOBS Coalition & Karmer Campaign – November 4, 2004-August 19, 2005 (0 Calls)
Spreadsheet – JOBS Coalition & Karmer Campaign – August 20, 2005-December 31, 2005 (0 Calls)
Spreadsheet – USCC & State Farm – January 1, 2003-December 31, 2005 (362 Calls)
Spreadsheet – USCC & State Farm – January 1, 2003-November 3, 2004 (335 Calls)
Spreadsheet – USCC & State Farm – November 4, 2004-August 19, 2005 (17 Calls)
Spreadsheet – USCC & State Farm – August 20, 2005-December 31, 2005 (10 Calls)
Spreadsheet – IBRT & State Farm – January 1, 2003-December 31, 2005 (344 Calls)
Spreadsheet – IBRT & State Farm – January 1, 2003-November 3, 2004 (270 Calls)
Spreadsheet – IBRT & State Farm – November 4, 2004-August 19, 2005 (42 Calls)
Spreadsheet – IBRT & State Farm – August 20, 2005-December 31, 2005 (32 Calls)

Spreadsheet – State Farm & Karmer – January 1, 2003-December 31, 2005 (1 Call)
 Spreadsheet – State Farm & Karmer – January 1, 2003-November 3, 2004 (1 Call)
 Spreadsheet – State Farm & Karmer – November 4, 2004-August 19, 2005 (0 Calls)
 Spreadsheet – State Farm & Karmer – August 20, 2005-December 31, 2005 (0 Calls)
 Spreadsheet – CJRG & State Farm – January 1, 2003-December 31, 2005 (17 Calls)
 Spreadsheet – CJRG & State Farm – January 1, 2003-November 3, 2004 (17 Calls)
 Spreadsheet – CJRG & State Farm – November 4, 2004-August 19, 2005 (0 Calls)
 Spreadsheet – CJRG & State Farm – August 20, 2005-December 31, 2005 (0 Calls)
 Spreadsheet – Ed Rust (All Calls) – January 1, 2003-December 31, 2005 (143 Calls)
 Spreadsheet – Ed Rust (All Calls) – January 1, 2003-November 3, 2004 (110 Calls)
 Spreadsheet – Ed Rust (All Calls) – November 4, 2004-August 19, 2005 (18 Calls)
 Spreadsheet – Ed Rust (All Calls) – August 20, 2005-December 31, 2005 (15 Calls)
 Spreadsheet – ILCC & State Farm – January 1, 2003-December 31, 2005 (100 Calls)
 Spreadsheet – ILCC & State Farm – January 1, 2003-November 3, 2004 (78 Calls)
 Spreadsheet – ILCC & State Farm – November 4, 2004-August 19, 2005 (15 Calls)
 Spreadsheet – ILCC & State Farm – August 20, 2005-December 31, 2005 (7 Calls)
 Spreadsheet – State Farm & Karmer Campaign, Excluding Murnane – January 1, 2003-December 31, 2005 (30 Calls)
 Spreadsheet – State Farm & Karmer Campaign, Excluding Murnane – January 1, 2003-November 3, 2004 (21 Calls)
 Spreadsheet – State Farm & Karmer Campaign, Excluding Murnane – November 4, 2004-August 19, 2005 (7 Calls)
 Spreadsheet – State Farm & Karmer Campaign, Excluding Murnane – August 20, 2005-December 31, 2005 (2 Calls)
 Spreadsheet – State Farm & Karmer Campaign, Including Murnane – January 1, 2003-December 31, 2005 (433 Calls)
 Spreadsheet – State Farm & Karmer Campaign, Including Murnane – January 1, 2003-November 3, 2004 (267 Calls)
 Spreadsheet – State Farm & Karmer Campaign, Including Murnane – November 4, 2004-August 19, 2005 (103 Calls)
 Spreadsheet – State Farm & Karmer Campaign, Including Murnane – August 20, 2005-December 31, 2005 (63 Calls)
 Spreadsheet – State Farm & CEO Class Action Task Force – January 1, 2003-December 31, 2005 (16 Calls)
 Spreadsheet – State Farm & CEO Class Action Task Force – January 1, 2003-November 3, 2004 (7 Calls)
 Spreadsheet – State Farm & CEO Class Action Task Force – November 4, 2004-August 19, 2005 (5 Calls)
 Spreadsheet – State Farm & CEO Class Action Task Force – August 20, 2005-December 31, 2005 (4 Calls)
 Spreadsheet – William Shepherd & IBRT – January 1, 2003-December 31, 2005 (182 Calls)
 Spreadsheet – William Shepherd & IBRT – January 1, 2003-November 3, 2004 (135 Calls)
 Spreadsheet – William Shepherd & IBRT – November 4, 2004-August 19, 2005 (24 Calls)
 Spreadsheet – William Shepherd & IBRT – August 20, 2005-December 31, 2005 (23 Calls)
 Spreadsheet – William Shepherd & JOBS Coalition – January 1, 2003-December 31, 2005 (7 Calls)
 Spreadsheet – William Shepherd & JOBS Coalition – January 1, 2003-November 3, 2004 (6 Calls)
 Spreadsheet – William Shepherd & JOBS Coalition – November 4, 2004-August 19, 2005 (0 Calls)

Spreadsheet – William Shepherd & JOBS Coalition – August 20, 2005-December 31, 2005 (1 Call)

Spreadsheet – Kim Brunner & USCC – January 1, 2003-December 31, 2005 (7 Calls)

Spreadsheet – Kim Brunner & USCC – January 1, 2003-November 3, 2004 (1 Call)

Spreadsheet – Kim Brunner & USCC – November 4, 2004-August 19, 2005 (3 Calls)

Spreadsheet – Kim Brunner & USCC – August 20, 2005-December 31, 2005 (3 Calls)

Summary of Phone Calls (Previously Produced with Supplemental Report)

Chart of Summary of Phone Calls

Categorized Phone Number List

Avaya Telephone Logs produced by State Farm, which represent the underlying data for the Summary of Phone Calls, Spreadsheets and Chart of Summary of Phone Calls (previously relied on, but not identified in prior Supplemental Report).

Telephone Logs produced by AT&T, which represent the underlying data for the Summary of Phone Calls, Spreadsheets and Chart of Summary of Phone Calls (previously relied on, but not identified in prior Supplemental Report).

Telephone Logs produced by Verizon, which represent the underlying data for the Summary of Phone Calls, Spreadsheets and Chart of Summary of Phone Calls (previously relied on, but not identified in prior Supplemental Report).